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18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE GROUP, INC., FIDELITY
20 NATIONAL TITLE INSURANCE COMPANY, CHICAGO
21 TITLE INSURANCE COMPANY, and CHICAGO TITLE OF
22 NEVADA, INC.

23 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
24 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 2950 E. Flamingo Road, Suite L
27 Las Vegas, Nevada 89121

28 **UNITED STATES DISTRICT COURT**

DISTRICT OF NEVADA

19 BANK OF AMERICA, N.A.,

20 Plaintiff,

21 vs.

22 FIDELITY NATIONAL TITLE GROUP,
23 INC. et al.,

24 Defendants.

Case No.: 2:21-CV-00971-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

SECOND REQUEST

25 COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”), Fidelity National
26 Title Insurance Company (“Fidelity”), Chicago Title Insurance Company (“Chicago Title”) and
27 Chicago Title of Nevada, Inc. (“Chicago Agency”) (collectively “Defendants”) and plaintiff Bank
28 of America, N.A. (“BANA”), by and through their respective attorneys of record, which hereby

1 agree and stipulate as follows:

2 1. On May 19, 2021 BANA filed its complaint in the Eighth Judicial District Court
3 for the State of Nevada;

4 2. On May 20, 2021, Chicago Title removed the instant case to the United States
5 District Court for the State of Nevada (ECF No. 1);

6 3. On June 23, 2020, the Court granted the Parties first stipulation extending the time
7 for Defendants to respond to the complaint until July 29, 2021 (ECF No. 10);

8 4. Counsel for Defendants request a 32-day extension, through and including
9 Monday, August 31, 2021 for Defendants to file their respective responses to BANA's complaint
10 to afford Defendants' counsel additional time to review and respond to the allegations of BANA's
11 complaint.

12 5. Counsel for BANA does not oppose the requested extension;

13 6. This is the second request for an extension made by counsel for Defendants, which
14 is made in good faith and not for the purposes of delay.

15 7. This stipulation is entered into without waiving any of Defendants' objections
16 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Monday, August 31, 2021.

3 Dated: July 27, 2021

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 FIDELITY NATIONAL TITLE GROUP,
9 INC., FIDELITY NATIONAL TITLE
INSURANCE COMPANY, CHICAGO
TITLE INSURANCE COMPANY and
CHICAGO TITLE OF NEVADA, INC.

10 Dated: July 27, 2021

WRIGHT FINLAY & ZAK, LLP

11 By: /s/-Christina V. Miller

12 CHRISTINA V. MILLER
13 Attorneys for Plaintiff
14 BANK OF AMERICA, N.A.

15 **IT IS SO ORDERED.**

16 Dated this 27th day of July, 2021.

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18 Elayna J. Youchah
19 ELAYNA J. YOUCRAH
20 UNITED STATES MAGISTRATE JUDGE
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